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U.S. District Court
Western District of Arkansas
Hot Springs Division

US DISTRICT COURT
WESTERN DIST ARKANSAS
FILED

AUG 18 2017

DOUGLAS F. YOUNG, Clerk
By Deputy Clerk

Hill

vs

CS# 17-6065

Kelly et al

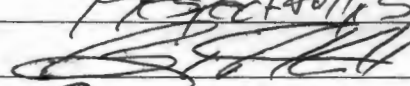
Brief in Support of Motion for
Emergency Injunction

Comes now the plaintiff Brian Hill 654193 pro se to make the following Brief in Support of his Motion for Emergency Injunction against ADC.

The plaintiff has been physically assaulted by known Arson Gang Members in ADC on numerous occasions. And ADC has failed and refused to keep plaintiff safe and or protect him while in ADC. Plaintiff has notified staff numerous times about being in fear of own safety and protection in ADC. Yet they again failed and refused to listen to plaintiff and placed him right back in General Population causing even more problems with the Arson Gang Members at ORCU unit. This has also caused Plaintiff to loose his class 1 status, so he could be released. Every time plaintiff "walked" down another 90 days to get his class so he could go home another Arson Jumped on plaintiff causing him to loose his class again and not being able to get released. This has now happened 3 times since Jan. And this is all because ADC has failed and refused to keep plaintiff safe and to protect him from known or unknown enemies while in ADC. So if ADC would have listened to Plaintiff in Jan 2017 about him being in fear of his own safety and protection while in ADC. Plaintiff could've been released from ADC

Delta Unit
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and not been subjected to further injury and harm caused by the Aryans because ADC refused to follow policy and listen to plaintiff and keep him safe. The Plaintiff has now on (3) occasions told staff since June 1st 2017 he again needed to be removed from General Pop And has been harmed, punished and threatened by receiving or going to receive a Major Disciplinary for being in fear of my own safety and protection in ADC. ADC has caused the Plaintiff his Class 2 or 1 Status by making him stay in General Population and be subjected to further injury and harm along with being punished for this. Plaintiff only needs his Class 2 to be able to go up for parole and to be released from ADC. Yet again ADC is keeping plaintiff from obtaining this class 2, by keeping him in General Population or insiting him a major Disciplinary for not wanting to stay in "GP" for my own safety and protection. That's why Plaintiff seeks to obtain this "Emergency Injunction" to be placed in Protective Custody and to receive his Class 2 or 1 Status so he can be released.

Respectfully Submitted

Brian Hill 654/193 Rose
880 E Gaines
Des Moines IA 50316

Signed this 16th day of August 2017